

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**JAYSON CARROLL, individually and on
behalf of all persons similarly situated,** : Civil Action No.: 2:21-cv-01288

Plaintiffs, :

v. :

**NORTHEAST COMMUNITY CENTER
FOR BEHAVIORAL HEALTH,** :

Defendant. :

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF THE
SETTLEMENT AGREEMENT**

Plaintiff Jayson Carroll, through his undersigned counsel, respectfully moves this Court for an Order:

1. Preliminarily approving the Parties' Settlement Agreement, which is attached as Exhibit 1 to this Motion, as fair, reasonable, and adequate pursuant to Fed. R. Civ. P. 23(e);
2. Approving the terms and conditions contained in the Settlement as a fair and reasonable resolution of a *bona fide* dispute under the Fair Labor Standards Act;
3. For settlement purposes, certifying the Settlement Class as a collective pursuant to 29 U.S.C. § 216(b), pending final approval of the settlement:

All current and former Blended Case Managers who were employed by Northeast Community Center for Behavioral Health between March 17, 2018 through March 17, 2022;

4. For settlement purposes, certifying the Settlement Class pursuant to Fed. R. Civ. P. 23, pending final approval of the settlement as follows:

All current and former Blended Case Managers who were employed by Northeast Community Center for Behavioral Health in Pennsylvania between March 17, 2018 through March 17, 2022;

5. Preliminarily approving Plaintiff Jayson Carroll as the Representative of the Settlement Class;

6. Preliminarily approving Willig, Williams, & Davidson as Class Counsel for the Settlement Class;

7. Approving the Notice of Settlement, attached as Exhibit A to the Settlement Agreement, and finding that the proposed method of disseminating the Settlement Notice meets the requirement of due process, and is the best notice practicable under the circumstances, and authorizing dissemination of the Notice to members of the Settlement Class;

8. Approving the proposed schedule and procedure for completing the final approval process as set forth in the Parties' Settlement Agreement and setting a date and time for the final approval hearing.

This Motion is based on the accompanying Memorandum of Law, the Declaration of Ryan Allen Hancock in Support of the Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement Agreement, the attached Exhibits, and all other records, pleadings, and papers on file in this action. Defendant does not oppose this Motion. A proposed Order is submitted for the Court's consideration.

Dated: April 21, 2022

Respectfully submitted,

/s/ Ryan Allen Hancock
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